

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

NORA HILGART-GRIFF et al.,	)	
	)	
Plaintiffs,	)	Case No. 2:24-cv-13425
	)	
v.	)	Hon. Laurie J. Michelson
	)	Mag. Elizabeth A. Stafford
REGENTS OF THE UNIVERSITY OF	)	
MICHIGAN et al.,	)	
	)	
Defendants.	)	

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**DECLARATION OF MARTINO HARMON IN SUPPORT OF  
DEFENDANTS’ MOTION TO DISMISS THE AMENDED  
COMPLAINT WITH PREJUDICE OR, IN THE ALTERNATIVE,  
TO STRIKE PLAINTIFFS’ CLASS ALLEGATIONS**

I, Martino Harmon, declare as follows:

1. I am the Vice President for Student Life at the University of Michigan (the “University”). I make this declaration in support of Defendants’ motion to dismiss the Amended Complaint filed in this action or, in the alternative, to strike Plaintiffs’ class allegations. I have personal knowledge of the contents of this declaration and could testify thereto.

2. Through my role, I have personal involvement with the University’s policies and proceedings at issue in this action, including the policies governing student and recognized student organization accountability proceedings as well as

those governing the use of University spaces.

3. Attached to my declaration as **Exhibit A** is a true and correct copy of the 2022 *Statement of Student Rights and Responsibilities*. Exhibit A is referenced in the Amended Complaint at paragraphs 76 through 99, and is also quoted in paragraph 78.

4. Attached to my declaration as **Exhibit B** is a true and correct copy of the 2022 *Standards of Conduct for Recognized Student Organizations*. Exhibit B is referenced in the Amended Complaint at paragraphs 189, 191, 195, and 207.

5. Attached to my declaration as **Exhibit C** is a true and correct copy of the 2022 Student Organization Advancement and Recognition Accountability Procedure Manual. Exhibit C is referenced in the Amended Complaint at paragraphs 191 through 198 and 200, and is also quoted in paragraph 197.

6. Attached to my declaration as **Exhibit D** is a true and correct set of screenshots of the University's Policies for Diag Use, available on the University's public website at the following URLs:

- <https://campusinvolvement.umich.edu/article/central-campus-diagnorth-campus-gerstacker-grove>;
  - <https://campusinvolvement.umich.edu/article/diag-grove-reservation-1>;
  - <https://campusinvolvement.umich.edu/article/diag-grove-reservation-2>;
- and

- <https://campusinvolvement.umich.edu/article/diag-grove-reservation-3>.

7. Attached to my declaration as **Exhibit E** is a true and correct copy of the Office of Student Conflict Resolution complaint filed against Plaintiff Nora Hilgart-Griff on June 3, 2024. Exhibit E is referenced in the Amended Complaint at paragraph 144.

8. Attached to my declaration as **Exhibit F** is a true and correct copy of the Office of Student Conflict Resolution complaint filed against Plaintiff Jared Eno on June 3, 2024. Exhibit F is referenced in the Amended Complaint at paragraph 143.

9. Attached to my declaration as **Exhibit G** is a true and correct copy of the Office of Student Conflict Resolution complaint filed against Plaintiff Kristen Bagdasarian on June 3, 2024. Exhibit G is referenced in the Amended Complaint at paragraph 144.

10. Attached to my declaration as **Exhibit H** is a true and correct copy of the Office of Student Conflict Resolution complaint filed against Plaintiff Zaynab Omar Ibn Al-Khattab Elkolaly on June 3, 2024. Exhibit H is referenced in the Amended Complaint at paragraph 145.

11. Attached to my declaration as **Exhibit I** is a true and correct copy of the Office of Student Conflict Resolution complaint filed against Plaintiff Rhea Chappell (legally “Nolan Chappell”) on June 3, 2024. Exhibit I is referenced in the

Amended Complaint at paragraph 145.

12. Attached to my declaration as **Exhibit J** is a true and correct copy of the Office of Student Conflict Resolution complaint filed against Plaintiff Arwa Hassaballa on June 3, 2024. Exhibit J is referenced in the Amended Complaint at paragraph 144.

13. Attached to my declaration as **Exhibit K** is a true and correct copy of the Student Organization Advancement and Recognition Accountability Process complaint filed against Students Allied for Freedom and Equality (SAFE) on October 31, 2024. Exhibit K is referenced in the Amended Complaint at paragraphs 207 through 208.

14. Attached to my declaration as **Exhibit L** is a true and correct copy of the decision I issued on October 21, 2024, regarding the complaints referenced in the above paragraphs 6 through 11 of my declaration. Exhibit L is referenced in the Amended Complaint at paragraphs 166 through 175, and is also quoted in paragraph 175.

15. Attached to my declaration as **Exhibit M** is a true and correct copy of the decision issued by Dean of Students Laura Blake Jones on January 16, 2025, regarding the complaint filed against SAFE referenced in the above paragraph 13 of my declaration. Exhibit M is referenced in the Amended Complaint at paragraphs 241 through 246, and is also quoted in paragraph 243.

16. Attached to my declaration as **Exhibit N** is a true and correct copy of the decision I issued on March 25, 2025, regarding the complaint filed against SAFE referenced in the above paragraph 13 of my declaration. Exhibit N is referenced in the Amended Complaint at paragraphs 251 through 252.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of May, 2025, in Ann Arbor, Michigan.

A handwritten signature in dark ink, appearing to read "Martino Harmon", written over a horizontal line.

Martino Harmon  
Vice President for Student Life  
University of Michigan